## UNITED STATES DISTRICT COURT **DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND

IRBESARTAN PRODUCTS LIABILITY

LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO: Joseph Kessinger v. Aurobindo Pharma USA, Inc., et. al.

## NOTICE OF VIDEOTAPED DEPOSITION OF

## PLAINTIFF, JOSEPH KESSINGER

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, filed November 17, 2020 – Document 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Plaintiff, Joseph Kessinger, on November 18, 2021 at 9:00 a.m., CDT. Please take further notice that: the deposition will be conducted completely remote, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Ethan R. Feldman CIPRIANI & WERNER, P.C. 450 Sentry Parkway East Suite 200 Blue Bell, PA 19422 (610) 567-0700 efeldman@c-wlaw.com

Date: October 18, 2021 Respectfully submitted,

s/ Ethan Feldman

Ethan R. Feldman CIPRIANI & WERNER, P.C. 450 Sentry Parkway East Suite 200 Blue Bell, PA 19422 (610) 567-0700 efeldman@c-wlaw.com

Attorney for Defendants Aurobindo Pharma USA, Inc., Aurobindo Pharma Ltd., and Aurolife Pharma LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of October, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Joseph Kessinger to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on Plaintiff's counsel by e-mail, with a copy served on all parties via MDL Centrality, on October 18, 2021.

This 18th day of October, 2021.

/s/ Ethan R. Feldman
Ethan R. Feldman